

# Instructions To The Application To The National Environmental Performance Track Program

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## Contact Information

The purpose of this section is to collect information about your facility's physical location and the person who will serve as your facility's contact person.

First, provide the name of the facility applying for admission. If you are submitting an application for multiple facilities in one corporation, you must call 1-888-339-PTRK. Also, if your company has multiple members in the program (or plans to have multiple members in the future), we suggest that you choose facility names that distinguish one facility from another.

If your facility is owned by another company, a division of a larger company, or the responsibility of another company, provide the name of that company in the parent company field. Please note, however, that any parent company you list below will not appear on Performance Track documentation. If it is important that parent company appear in the facility's title, then please include it in the facility name section.

In the Facility Location section, provide the physical location of the facility applying for membership. Please list all addresses of sites/buildings considered part of your facility. In the Contact Information section, provide information for the individual who should be contacted for additional information about your facility's application. If applicable, use the Mailing Address section to provide an alternate mailing address for the facility contact person.

If you need further assistance, please contact the Performance Track Information Center at 1-888-339-PTRK or [ptrack@indecon.com](mailto:ptrack@indecon.com).

## Section A

In this section, please provide some basic information about your facility. Use the following links to view the instructions for each item in Section A. Required fields are noted using an asterisk (\*). If you need further assistance, contact the Performance Track Information Center at 1-888-339-PTRK or [ptrack@indecon.com](mailto:ptrack@indecon.com).

- [\\*1. What ways have you learned about Performance Track?](#)
- [\\*2. What do you do or make at your facility?](#)
- [\\*3. List the North American Industrial Classification System \(NAICS\) codes that you use to classify business at your facility.](#)
- [\\*4. How many employees \(full-time equivalents\) currently work at your facility?](#)
- [5. Optional: Is there anything else you would like to tell us about your facility? Do you participate in other voluntary programs at the local, tribal, State, or Federal level? Have you received any environmental awards?](#)
- [6. Optional: Is your facility currently a member of a state voluntary environmental leadership program?](#)

**\*1. What ways have you learned about Performance Track?**

Please select all the ways that you learned about Performance Track. This helps us to be more efficient in our program outreach.

**\*2. What do you do or make at your facility?**

Briefly describe the primary products that you manufacture, prepare, or assemble at your facility. For non-manufacturing facilities, describe the services you provide or activities you conduct.

**\*3. List the North American Industrial Classification System (NAICS) codes that you use to classify business at your facility.**

If your facility has more than one NAICS code, please list the primary code for the facility first, followed by all other codes. If you do not know your facility's classification code, please consult the following website:  
<http://www.census.gov/epcd/www/naicstab.htm>.

**\*4. How many employees (full-time equivalents) currently work at your facility?**

Select the option that best corresponds to the number of full-time equivalent (FTE) employees working at the facility. An FTE represents 2,000 hours per year. To calculate the number of FTEs, add the total hours worked during the calendar year by all employees, including part-time and seasonal employees, and divide the total by 2,000. The answer is your FTE.

**5. Optional: Is there anything else you would like to tell us about your facility? Do you participate in other voluntary programs at the local, tribal, State, or Federal level? Have you received any environmental awards?**

This question is optional. Use this space to share other information about your facility's environmental accomplishments and activities that you believe would be useful to other facilities and could assist us in highlighting the achievements of Performance Track members. This information will be used to develop a web profile of your facility should you be admitted to Performance Track. You may attach additional files.

**6. Optional: Is your facility a member of a state voluntary environmental leadership program?**

The National Environmental Performance Track is working with states to coordinate the implementation of Performance Track and state environmental leadership programs. In addition, we continue to work together to identify ways to streamline and facilitate our program application and reporting processes. If you are a member of a state voluntary environmental leadership program, select "Yes" and list the name of the program. If you are not a member of a program, and your facility is located in Colorado, Georgia, Texas, Utah, or Virginia then you can apply simultaneously to both Performance Track and your state's program through the Performance Track Application. Click on one of the links listed to learn more about your state's program, and select "Yes" to apply to both or "No" if you prefer to apply only to Performance Track. Please note that the state programs may have additional membership criteria and/or request supplementary information.

[Colorado Environmental Leadership Program Gold Level](#)

[Georgia's P2AD Partnership Program \(Red or Blue Ribbon Level\)](#)

[Texas Clean Leader](#)

[Clean Utah! \(Partner Level\)](#)

[Virginia Environmental Excellence Program \(E3 level -- Exemplary Environmental Enterprise\)](#)

Note: Joint application capabilities are currently being expanded. If your facility is interested in a joint application with a state program, see the electronic application for the latest list of eligible state programs, or call the Performance Track Information Center at 888-339-PTRK

## Section B Instructions

In this section tell us about the environmental management system (EMS) that your facility has in place. We need to know about your EMS because it represents your facility's systematic efforts to meet environmental requirements and improve environmental performance. You must be able to answer "yes" to questions 1-7 and 9-11 in order to qualify for Performance Track.

An EMS includes, but also goes beyond, managing for compliance with regulations. An EMS includes an analysis of aspects, which are those parts of a facility's activities, products, or services that can have an environmental impact. Aspects include both regulated and unregulated activities and impacts. An EMS should use a consistent, objective method for determining which of the aspects are "significant." This method may consider environmental risk, regulatory requirements, community concerns, opportunities for pollution prevention, and other factors. An EMS should include measurable objectives and targets for maintaining compliance with environmental requirements, for reducing risk from significant environmental aspects, and for advancing other priorities contained in your facility's environmental policy.

Use the following links to view the instructions for each item in Section B. Required fields are noted using an asterisk (\*). If you need further assistance, contact the Performance Track Information Center at 1-888-339-PTRK or [ptrack@indecon.com](mailto:ptrack@indecon.com).

[\\*Question 1. Are you a Responsible Care Certified Facility?](#)

[\\*2. Components of the EMS](#)

[Environmental policy](#)

[Planning](#)

[Implementation and Operation](#)

[Checking and Corrective Action](#)

[Management Review](#)

[\\*3. Have you done a comprehensive review of all activities conducted at your facility that could impact the environment? \(i.e. have you done an aspect analysis?\)](#)

[\\*4. Have you classified your aspects based on their potential harm to the environment, on community concerns, and/or on other objective factors? \(i.e. have you determined your significant aspects?\)](#)

[\\*5. When did you last update your aspect analysis? \(mo/yr\)](#)

[\\*6. Have you completed at least one EMS cycle \(plan-do-check-act\)?](#)

- \*7. Did this cycle include both an internal EMS and an internal compliance audit?
- \*8. Have you completed an independent assessment of your EMS in conformance with the Performance Track Independent Assessment Criterion?
- \*9. What was the date of your last independent EMS assessment? (mo/yr)
- \*10. Who performed this assessment?

**\*1. Are you a Responsible Care certified facility?**

Select "Yes" if your facility is a certified member of the Responsible Care program. Responsible Care is a voluntary program of the American Chemistry Council; the program's goals are to achieve improvements in environmental, health, and safety performance beyond levels required by the U.S. government. The National Environmental Performance Track has an agreement with the Responsible Care Program to work together to promote better environmental performance and measurement. In addition, Performance Track realizes that Responsible Care members meet Performance Track criteria for independent EMS assessment. For more information on Responsible Care visit: <http://www.americanchemistry.com/>

If yes, please answer the supplementary questions regarding your Responsible Care certification:

- Please indicate, by selecting of the radio buttons, whether your certification is to RC EMS or RC 14001.
- Select the appropriate radio button to indicate whether you are a member of American Chemistry Council (ACC).
- Select the appropriate radio button to indicate whether you are a member of the Synthetic Organic Chemical Manufacturers Association (SOCMA).

Responsible Care certified facilities do not need to complete the rest of the information in Section B as the fact that they are certified provides answers to these questions.

If no, please complete the remaining questions.

**\*2. Components of the EMS**

Because we believe that your EMS is critical to maintaining and improving your environmental performance, we strongly recommend that you review the questions in the EMS Worksheet about your EMS before answering Question 2.

If your EMS has been certified to ISO 14001, you should skip this worksheet and answer “Yes” to question 2.

## **EMS Worksheet**

### ***Environmental Policy***

- Does your EMS include a written environmental policy that has been defined by top facility management?
- Does your policy commit your facility to compliance with both your legal requirements and your voluntary commitments? **OR** Do you have programs and procedures in place that achieve compliance with both your legal requirements and your voluntary commitments?
- Does your policy commit your facility to preventing pollution at its source wherever possible?
- Does your policy commit your facility to continuously improve your environmental performance, even in areas where you do not have regulatory requirements?
- Does your policy commit your facility to sharing information with your community about your environmental performance and about how your EMS operates? **OR** Do you have programs and procedures in place that implement your commitment to share information with your community about your environmental performance?

If you can answer “Yes” to all of the questions in this section, then select “Yes” for Environmental Policy. Otherwise, select “No.”

### ***Planning***

- Have you conducted an analysis of all your facility's aspects, both regulated and unregulated?
- Have you determined which aspects are significant?
- Does your EMS include an inventory of all your legal requirements at the Federal, State, tribal, or local level?
- Does your EMS include procedures for integrating changes to your legal requirements or voluntary commitments into the EMS?
- Does your EMS include measurable objectives and targets and active, documented programs to meet your policy commitments?

If you can answer “Yes” to all of the questions in this section, then select “Yes” for Planning. Otherwise, select “No.”

### ***Implementation and Operation***

- Is there top management commitment to your EMS (e.g. a top manager with responsibility and authority for implementing your EMS)?
- Does your EMS establish roles and responsibilities for meeting the objectives and targets of the EMS, including compliance with legal requirements?
- Does your EMS establish procedures for achieving and maintaining compliance with legal requirements and meeting performance objectives?
- Does your EMS establish procedures for communicating EMS information throughout your organization, including information about your facility's environmental performance?
- Does your EMS hold managers and employees accountable for meeting EMS requirements?
- Does your EMS establish procedures for controlling EMS documents that include who will maintain the documents and where they will be stored?
- Does your EMS include a general environmental training program for all employees?
- Does your EMS include specific training for those who have direct responsibility for achieving legal compliance or the objectives and targets in the EMS?
- Does your EMS document all of the following:
  - Your environmental policy?
  - Your significant environmental impacts?
  - Your objectives and targets?
  - The manager in charge of the EMS?
  - Your compliance audit program?
  - Your EMS audit program?
  - Overall authority for the EMS?
- Does your EMS include operation and maintenance programs for equipment and other activities that are related to legal compliance and achieving the objectives and targets in the EMS?

- Does your EMS include an emergency-preparedness program?

If you can answer “Yes” to all of the questions in this section, then select “Yes” for Implementation and Operation. Otherwise, select “No.”

### ***Checking and Corrective Action***

- Does your EMS include an ongoing program for assessing facility performance and for preventing and detecting nonconformance with your EMS?
- Do you have an EMS audit program?
- Does your EMS include an ongoing program for preventing and detecting noncompliance with legal requirements?
- Does your EMS include a compliance audit program?
- Does your EMS include an active program for prompt corrective action of noncompliance with legal requirements and of nonconformance with EMS requirements?

If you can answer “Yes” to all of the questions in this section, then select “Yes” for Checking and Corrective Action. Otherwise, check “No.”

### ***Management Review***

If you have a documented management review of the performance and the effectiveness of your EMS in meeting the EMS policy commitments, then select “Yes” to Management Review. Otherwise, select “No.”

- \*3. Have you done a comprehensive review of all activities conducted at your facility that could impact the environment? (i.e. have you done an aspect analysis?)**

An aspect is any part of a facility’s activities, products, or services that could have an impact on the environment. An aspect analysis includes both regulated and unregulated activities and products and their associated impacts. If you have done a complete inventory of all your facility’s operations and determined the activities that could have an impact on the environment, select “Yes” to this question. Otherwise, select “No.”



Examples of activities and aspects are:

<b>Activity</b>	<b>Aspect(s)</b>
Degreasing	Hazardous material use (toxic solvents)
Painting & Coating	Emissions of VOCs, Emissions of air toxics
Employee Commuting	Emissions of greenhouse gases, VOCs, NOx
Office HVAC Use	Energy use

- \*4. Have you classified your aspects based on their potential harm to the environment, on community concerns, and/or on other objective factors? (i.e. have you determined your significant aspects?)**

Some of your aspects should be classified as “significant” because they have the greatest potential to cause a significant environmental impact. Your EMS should include a consistent method for determining which of the aspects are significant. In addition to environmental risk, this method may consider other factors such as regulatory requirements, community concerns, or opportunities for pollution prevention. If you have identified and documented your significant environmental aspects, select “Yes.” Otherwise, select “No.”

- \*5. When did you last update your aspect analysis? (mo/yr)**

As part of your EMS implementation cycle, your aspect analysis should be reviewed and updated to insure that it continues to accurately reflect your facility’s activities. Please select the date (mo/yr) that you last updated your aspect analysis.

- \*6. Have you completed at least one EMS cycle (plan-do-check-act)?**

A complete cycle includes:

- Defining and documenting your EMS;
- Identifying significant aspects and legal requirements;
- Setting measurable objectives and targets;
- Establishing roles and responsibilities for meeting EMS and legal requirements;
- Conducting training for personnel on EMS and legal requirements;
- Taking steps to meet the established objectives and targets;

- Evaluating your progress in meeting the established objectives and targets;
- Conducting an EMS audit;
- Completing a compliance audit;
- Correcting any areas of EMS non-compliance or legal non-compliance; and
- Completing a management review of the EMS and its results.

If you have completed all of these activities, select “Yes.” If not, select “No.”

**\*7. Did this cycle include both an internal EMS and an internal compliance audit?**

Select “Yes” if you have completed an internal audit of the EMS and an internal audit of compliance with applicable Federal, State, tribal and local environmental requirements.. This question does not refer to inspections by government agencies or to independent or external audits of your EMS or compliance. Otherwise, select “No.”

**\*8. Have you completed an independent assessment of your EMS in conformance with the Performance Track Independent Assessment Criterion?**

All facilities applying to the program must have had an independent assessment of their EMS within the 3 year period preceding their application. Guidelines for these assessments are set out in the [Independent EMS Assessment Criterion](#). An independent assessment is one that is performed by someone who is neither directly employed by your facility nor someone who has played a substantive role in developing your EMS. The assessment must be performed using a protocol that covers all of the Performance Track EMS elements, which are covered in the checklist above for questions 1 through 5.

The lead auditor for your assessment must have certain qualifications as set out in the Independent EMS Assessment Criterion. In addition, EPA has developed an [Independent Assessment Protocol](#) that facilities may use as a stand-alone audit protocol or as a supplement to an existing audit protocol. The Independent EMS Assessment Criterion sets out a number of options for how a facility may obtain an independent assessment. For example, a corporate audit meeting the above criteria would qualify as an independent assessment.

The qualifications for individuals conducting independent assessments are consistent with those established by the Registrar Accreditation Board and the Board of Environmental, Health, & Safety Auditor Certifications for ISO 14001 lead auditors. In addition, the ISO 14001:1996 EMS specification covers all of the

major Performance Track EMS elements except the requirement for sharing information with your community about your environmental performance (in the checklist under question 1). If you are certified to ISO 14001 and have made a commitment to, and have programs for, sharing information with your community about your environmental performance, then you have met this requirement for an independent assessment of your EMS.

If you have had an independent assessment of your EMS that meets these criteria, select "Yes." Otherwise, select "No." Then select the method of EMS assessment. If you are certified to ISO 14001, select "ISO 14001." If you used the Performance Track Independent Assessment Protocol, select that option. Otherwise, select "Other" and specify the type of assessment used (the assessment still must cover all of the NEPT EMS criteria).

**\*9. What was the date of your last independent EMS assessment? (mo/yr)**

Select the month and year of your last independent EMS assessment. This date must be within the past 36 months in order for you to qualify for Performance Track.

**\*10. Who performed the independent assessment?**

Enter the name, title, and company affiliation of the lead auditor for your independent assessment.

## Section C Instructions: Past Achievements

In this section, we need you to demonstrate your facility's past achievements. Your past achievements must be expressed in terms of quantitative improvements in indicators included in the [Environmental Performance Table](#). The Environmental Performance Table includes a broad range of environmental impacts. Not all of these environmental impacts will be relevant to your facility. In the Table, we've captured the general types of environmental impacts as "categories" and then broken them down into more specific impacts we call "indicators." These "indicators" are quantified by the units in the right-hand column.

It is important to remember that some indicators are currently regulated and some are not. If you choose an indicator that is regulated, then you must commit to performance goals that go beyond the Federal, State, tribal, and local regulatory requirements.

To demonstrate past achievements, you will select two environmental indicators from any of the categories in the Environmental Performance Table. Then, complete the Achievement tables to report performance on those indicators. If you are a small facility, you can choose to complete only the table for the first indicator.

Use the following links to view the instructions for each item in Section C. Required fields are noted using an asterisk (\*). If you need further assistance, contact the Performance Track Information Center at 1-888-339-PTRK or [ptrack@indecon.com](mailto:ptrack@indecon.com).

### [\\*1a. and 1b. Category and Indicator](#)

[1c. Please provide additional detail on your indicator \(e.g., specific chemical reduced, specific waste component\).](#)

[\\*1d. What activities or process changes did you undertake to accomplish this achievement?](#)

### [\\*2a. Reporting Years](#)

[\\*2b. List the past annual quantity of the indicator, and the current annual quantity of the indicator.](#)

[\\*2c. What units are you using to quantify this indicator?](#)

[\\*2d. Estimate your past normalizing factor](#)

[\\*2e. What is your past normalizing factor based on?](#)

**\*1a. and 1b. Category and Indicator**

Select the category and indicator from the drop-down menu.

**1c. Please provide additional detail on your indicator (e.g., specific chemical reduced, specific waste component).**

If your achievement is more specific than the indicator, please provide a precise description. For example, if your achievement was reducing emissions of methane, and you chose the indicator "VOCs," please enter "methane" here.

**\*1d. What activities or process changes did you undertake to accomplish this achievement?**

We'd like to know how you achieved this improvement. Information you might include is: process changes, equipment, product redesigns, shutting off equipment when not in use, etc.

**\*2a. Reporting Years**

We have pre-filled the calendar years for which you should measure Baseline and project Future quantities of your indicator.

**\*2b. List the past annual quantity of the indicator, and the current annual quantity of the indicator.**

For the "Past" annual quantity, please enter quantity of the indicator for the calendar year listed on your application form in the left column. For the "Current" quantity, enter the quantity of the indicator for the calendar year listed on your application form in the right column.

**\*2c. What units are you using to quantify this indicator?**

Select the units from the drop-down menu. You must use the units in the drop-down menu.

**\*2d. Estimate your past normalizing factor**

Environmental performance can be measured by the actual amount of environmental impacts (the "environmental footprint", or by the environmental impact relative to economic activity (also called "eco-efficiency.") A complete picture of a facility's environmental progress should include both measurements.

A normalizing factor will allow this conversion between the actual and relative impacts, while protecting the confidentiality of production levels, product content, or other sensitive information. The best normalizing factors are direct measures of production, for example, number of cars produced, KWh of electricity generated, dollars of sales adjusted for inflation. Depending on the facility, "production" may instead refer to services delivered or to some other productive

output from the facility. Research, service, and governmental facilities may find it more difficult to determine their normalizing factors, and instead may have to rely on substitute measures of production, such as employment.

A simple normalizing factor for your past year's data would be the production in the past year divided by production in the current year. If your facility or company has developed a production index that weighs heterogeneous types of products according to size, complexity, or other factors, you may use that as your normalizing factor. Please provide a brief description of the index. It is not necessary to provide the exact equation, but please do list or describe the types of factors included.

If you need help determining the basis for your normalizing factor, please see the Performance Track normalizing guidance that is posted on the [Performance Track website](#).

**\*2e. What is your past normalizing factor based on?**

Please type in the basis for the normalizing factor you reported in 2d.

## Section C Instructions: Future Commitments

In this section, we need you to commit to reporting on future improvements at your facility. Your future improvements must be expressed in terms of quantitative improvements in indicators included in the [Environmental Performance Table](#). The Environmental Performance Table includes a broad range of environmental impacts. Not all of these environmental impacts will be relevant to your facility. In the Table, we've captured the general types of environmental impacts as "categories" and then broken them down into more specific impacts we call "indicators." These "indicators" are quantified by the units in the right-hand column.

It is important to remember that some indicators are currently regulated and some are not. If you choose an indicator that is regulated, then you must commit to performance goals that go beyond the Federal, State, tribal, and local regulatory requirements.

You may select up to six commitments, but should select no more than two commitments in any one category. Small facilities, those with fewer than 50 employees, are required to make two commitments. All other facilities are required to make four commitments. After selecting commitments, enter specifics about your commitment by clicking the "Edit" link to the right of the commitment or by clicking the "Next" button in the menu bar. You may also delete and define a new commitment by clicking the "Delete" link next to a specific commitment in the table. Please note that by deleting a commitment, you will delete all information you may have entered in the associated commitment table. To the extent possible, EPA will automatically calculate quantities in the commitment tables based upon information you provide. Information on how total energy use, emissions of greenhouse gases, and waste calculations are made is provided in the detailed instructions for these specific indicators.

Use the following links to view the instructions for each item in Section C. Required fields are noted using an asterisk (\*). If you need further assistance, contact the Performance Track Information Center at 1-888-339-PTRK or [ptrack@indecon.com](mailto:ptrack@indecon.com).

[\\*1a. and 1b. Category and indicator](#)

[1c. Please provide additional detail on your indicator](#)

[\\*1d. What activities or process changes do you plan to undertake at your facility to accomplish your commitment?](#)

[\\*2. Are you proposing this as a regional challenge commitment?](#)

[\\*3a. and 3b. Is this indicator considered significant in your EMS?](#)

[\\*4a. Reporting Years](#)

[\\*4b. and 4c. Units and baseline and future quantities](#)

[Total Energy Use Commitments](#)  
[Emissions of Greenhouse Gas Commitments](#)  
[Total Hazardous Waste Commitments](#)  
[Total Non-Hazardous Waste Commitments](#)

[\\*5. Does the quantity presented in the future quantity column represent an actual goal or a normalized goal?](#)

[\\*6. Please briefly describe your intended basis for normalizing.](#)

[\\*7a. and 7b. Are you subject to Federal, State, tribal, or local regulatory requirements for this indicator?](#)

**\*1a. and 1b. Category and indicator**

Displays the category and indicator you selected on the Commitments page. To change either the commitment or indicator, return to the selection page using the "Sect.C Future" button on the menu bar. By deleting this commitment, you will delete all information you have entered on this commitment page. For more information on these categories and indicators, see the [Environmental Performance Table](#).

**1c. Please provide additional detail on your indicator**

As noted in the Environmental Performance Table, for some indicators you have the choice of reporting on a specific subset of an indicator (e.g., one specific material or a particular group of air toxics). If the indicator that you have chosen does not offer this option, then the "All" button will be automatically selected for you. If the indicator that you have chosen does offer this option, then please indicate whether your measurement reflects the total indicator (check "All") or a particular element (check "Specific").

Important: A distinction should be made between "total" amounts ("all") and "facility-wide" ("entire facility"). "Total" and "all" refer to the environmental indicator. For example, "total materials use" refers to all materials used at a facility, as opposed to a specific material (paper, lead, etc.) or subset (e.g., oil-based paints). "Facility-wide" and "entire facility" refer to the scope of the measurement. All measurements should represent the performance level for the indicator across the entire facility. Measurements should not show performance at a process-, product-, or building-specific levels, unless the selected indicator is only used or generated in that specific area.

If you selected "specific", please type in a description of your indicator (for example, a chemical name).

**\*1d. What activities or process changes do you plan to undertake at your facility to accomplish your commitment?**



Describe the actions you will take to meet this commitment. You might include information like: process changes, equipment upgrades, product redesign, or shutting off equipment while not in use. This information might be used by other facilities looking for ideas on improving their own performance, so please give them a good idea of how you are going to accomplish your goal without getting bogged down in details. A short paragraph should be sufficient.

**\*2. Are you proposing this as a regional challenge commitment?**

**Instructions for Making Challenge Commitments**

Some EPA Regions have established challenge commitments for their Performance Track facilities. A facility that makes a challenge commitment can choose to make only two additional commitments, rather than three. However, a small facility that makes a challenge commitment would still have to make one additional commitment. For more details, please read EPA's [Challenge Commitment Policy for the National Environmental Performance Track Program](#) (PDF, 45 KB, 2 pp.).

The following regions have established challenge commitments:

- Region 1 (Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont)
- Region 2 (New Jersey, New York, Puerto Rico, US Virgin Islands)
- Region 3 (Delaware, District of Columbia, Maryland, Pennsylvania, Virginia, West Virginia)
- Region 6 (Arkansas, Louisiana, New Mexico, Oklahoma, Texas)

**Region 1**

**Region 1** is offering an Energy Challenge. The Energy Challenge is in the form of a greenhouse gas reduction commitment, i.e. a facility should select Air Emissions as the category and Total GHGs as the indicator. In order to receive credit for the challenge commitment, the facility must commit to reducing greenhouse gases by at least 5% before normalizing (i.e., check "Absolute Goal" in question 5). Thus the "Future" quantity of MTCO<sub>2</sub>E on the line labeled "Total Emissions Less Offsets" must be at least 5% less than the "Baseline" quantity.

Region 1 offers additional information and technical assistance in meeting the region's Energy Challenge. Please contact Jean Holbrook at 617-918-1816 or [holbrook.jean@epa.gov](mailto:holbrook.jean@epa.gov).

## **Region 2**

**Region 2** is offering challenge commitments in the categories of Air Emissions and Energy Use.

### **Air Emissions**

Within the Air Emissions category, a facility may choose from the indicators VOCs, NOx, PM10, or Air Toxics. Facilities that select VOCs or Air Toxics should measure and report on all emissions for that indicator, as opposed to selecting specific VOCs or air toxics.

The quantities reported in the data table (question 4) should include emissions from both mobile and stationary sources. However, the facility need not plan on making improvements in both areas, but rather may choose to focus its improvement activities on one area or the other. In order to receive credit for the challenge commitment, under question 1d the facility should specify 1) what quantities of the total emissions come from mobile sources and what quantities come from stationary sources and 2) the intended primary activities for achieving emissions reductions. If the primary focus of the emissions reductions will be on mobile sources, the facility should plan on reducing the emissions associated with mobile sources by at least 10% before normalizing. If the primary focus of the commitment is on emissions from stationary sources, the facility should plan on reducing its stationary sources by at least 20% before normalizing. So, while the goal amount reported in question 4 may not reflect the planned 10% or 20% reduction, the facility should provide sufficient information under question 1d to enable EPA to determine whether the facility meets the challenge commitment criteria. In question 5 the facility must select "Absolute Goal."

### **Energy Use**

A facility must commit to reducing energy use by at least 10% from the baseline year (before normalizing) to receive credit for a challenge commitment. The facility may choose to reduce either transportation energy use or non-transportation energy use. In question 5 the facility must select "Absolute Goal."

Region 2 is offering additional technical assistance for facilities undertaking a challenge commitment. This assistance will include help in quantifying current emissions and choosing and implementing programs for emissions and energy use reductions. Contact Judy-Ann Mitchell at (212) 637-3721 or Marcia Seidner at (212) 637-3584.

## **Region 3**

**Region 3** is offering challenge commitments in two areas: air emissions and diesel use in transportation.

In order to be eligible for the challenge commitments, a facility in Region 3 must be located in an area that is in not attaining the federal air quality standards for ozone or for fine particles (PM2.5).

For a list of areas not attaining the federal air quality standards for ozone, see [www.epa.gov/reg3artrd/airquality/tabular.htm](http://www.epa.gov/reg3artrd/airquality/tabular.htm).

For a list of areas not attaining the federal air quality standards for fine particles, see [www.epa.gov/reg3artrd/airquality/Final%20Area%20by%20Area.pdf](http://www.epa.gov/reg3artrd/airquality/Final%20Area%20by%20Area.pdf).

**Air Emissions.** A facility in Region 3 may make a challenge commitment by choosing Air Emissions as the category and then selecting from the indicators VOCs, SO<sub>2</sub>, PM<sub>2.5</sub>, or NO<sub>x</sub>. In order to receive credit for the challenge commitment, the facility must commit to reducing the chosen emissions by at least 15% of the baseline figure before normalizing. Thus the "Future" quantity on line 4c must be at least 15% lower than the "baseline" quantity on line 4c. Under question 5, the facility should select "Absolute goal."

**Energy Use.** Alternatively, a facility in Region 3 may make a challenge commitment by choosing Energy Use as the category, Transportation Energy Use as the indicator, and focusing specifically on diesel fuel usage. (For question 1c, select "Specific" from the dropdown menu and then enter "diesel fuel" in the text box.) To be eligible for this challenge commitment, the facility should have a minimum of ten diesel vehicles in its fleet at the time the commitment is made and must commit to reducing its gallons of diesel use by at least 15% from the baseline levels. Under question 5, the facility should select "Absolute goal."

Please contact Marie Holman at 215-814-5463 for further information and technical assistance.

## **Region 6**

**A facility in Region 6** must be located in an area that is in non-attainment of the federal air quality standard for ozone (see below) to qualify to make a challenge commitment. The facility can make a challenge commitment by choosing Air Emissions as a category and either VOCs or NO<sub>x</sub> as the indicator. In order to receive credit for the challenge commitment, the facility must commit to reducing the selected emissions by at least 15% before normalizing. Thus the "future" quantity on the line 4c must be at least 15% lower than the "baseline" quantity on line 4c. Under question 5, the facility should select "Absolute goal."

The ozone non-attainment areas are:

## **TEXAS**

### **Beaumont-Port Arthur, TX (Moderate)**

Hardin County  
Jefferson County  
Orange County

**Dallas-Fort Worth, TX (Serious)**

Collin County Dallas County  
Denton County  
Tarrant County

**El Paso, TX (Serious)**

El Paso County

**Houston-Galveston-Brazoria, TX (Severe-17)**

Brazoria County  
Chambers County  
Fort Bend County  
Galveston County  
Harris County  
Liberty County  
Montgomery County  
Waller County

**LOUISIANA**

**Baton Rouge, LA (Severe-15)**

Ascension Parish  
East Baton Rouge Parish  
Iberville Parish  
Livingston Parish  
West Baton Rouge Parish

**NEW MEXICO**

**Sunland Park, NM (New Area 1995) (Marginal)**

Dona Ana County (P)

Please contact Craig Weeks at 214-665-7505 for further information and technical assistance.

**\*3a. and 3b. Does this commitment address a significant aspect in your EMS?**

During the planning phase of your EMS, you should have designated some of your environmental aspects as "significant." If this commitment addresses one of those significant aspects, check "Yes." Otherwise, check "No."

If you answered "No" in part a, under part b please explain why you believe the selected indicator should be included as a performance commitment. Significant aspects are usually those that pose the highest environmental risk, or are of particular local concern. In general, we expect Performance Track facilities to be working on these priorities first. If your commitment does not address a significant aspect, please explain why you think it is important.

Note: At least three of your commitments should address significant aspects.

**\*4a. Reporting Years**

We have pre-filled the calendar years for which you should measure Baseline and project Future quantities of your indicator.

**\*4b. and 4c. Units and baseline and future quantities**

Choose from the drop-down menu the units you are using to measure your indicator. You must use units included in the menu. For the "Baseline" quantity, give us the annual measurement of the indicator for the calendar year indicated in 4a. For the "Future" quantity, please give us the annual amount that you are committed to achieve by the calendar year indicated in 4a. Future commitments should not reflect changes in production.

Note: If you are subject to regulatory limits for the quantity of this indicator, your future goal must indicate performance that is better than required by those limits.

Use the links below to view specific instructions on the four indicators requiring more specific performance information:

[Total Energy Use Commitments](#)

[Emissions of Greenhouse Gas Commitments](#)

[Total Hazardous Waste Commitments](#)

[Total Non-Hazardous Waste Commitments](#)

**\*5. Does the quantity presented in the future quantity column represent a normalized goal or an absolute goal?**

If you intend for your goal to be evaluated relative (indexed) to the production levels in your baseline year, then you should check "Normalized goal." (Most member facilities have normalized goals.) If the numerical goal that you entered in 4c is the actual level that you intend to achieve, regardless of any increases in production, then you should check "Absolute goal."

**\*6. Please briefly describe your intended basis for normalizing**

Environmental performance can be measured by the absolute amount of environmental impacts (the "environmental footprint", or by the environmental impact relative to economic activity (also called "eco-efficiency.") A complete

picture of a facility's environmental progress should include both measurements. Regardless of whether you have decided to commitment to a normalized or absolute goal, in your annual performance reports you will be asked to report your progress in both actual and normalized terms.

A normalizing factor will allow this conversion between the absolute and relative impacts, while protecting the confidentiality of production levels, product content, or other sensitive information. The best normalizing factors are direct measures of production, for example, number of cars produced, KWh of electricity generated, dollars of sales adjusted for inflation. Depending on the facility, "production" may instead refer to services delivered or to some other productive output from the facility. Research, service, and governmental facilities may find it more difficult to determine their normalizing factors, and instead may have to rely on substitute measures of production, such as employment. If you need help determining the basis for your normalizing factor, please see the Performance Track normalizing guidance that is posted on the [Performance Track website](#).

If your facility or company has developed a production index that weighs heterogeneous types of products according to size, complexity, or other factors, you may use that as your normalizing factor. Please provide a brief description of the index. It is not necessary to provide the exact equation, but please do list or describe the types of factors included.

**\*7a. and 7b. Are you subject to Federal, State, tribal, or local regulatory requirements for this indicator?**

If you have any regulatory requirements related to this indicator—even if they do not directly address quantitative limits—check "Yes." Otherwise, check "No."

If you answered "Yes" under 7a, please list those requirements, including the quantitative limits and compliance deadlines that apply to you in part 7b. Please also explain how your commitment exceeds these requirements. We need this information to make sure that your commitment goes beyond compliance. Type in the regulation(s), compliance schedules, and quantitative limits that relate to the indicator. If the units used in the regulation are not the same as the units used in your commitment—for example, if the regulation states concentrations rather than mass—then explain how your commitment goes beyond the regulation. If the regulation does not address quantitative limits, state that here.

If there is additional information related to a commitment that you would like to include in your application, please attach it to your on-line application or return it with your application to the Performance Track Information Center at [ptrack@indecon.com](mailto:ptrack@indecon.com).

### **Total (non-transportation) Energy Use Commitments**

If you choose "Total Energy Use" as your indicator, you will need to supply additional information about the sources of your energy. This information will allow this automated form to convert your energy savings to greenhouse gas reductions. You can use the greenhouse gas reduction results when participating in emerging greenhouse gas protocols, registries, and trading schemes, including those developed by EPA's Climate Leaders program, the World Resources Institute / World Business Council for Sustainable Development, and the U.S. Department of Energy. We will use the greenhouse gas reduction results when we report on the overall results of the Performance Track program.

This new energy use commitment form allows you to commit to either reducing total energy use or to switching from nonrenewable to renewable fuel use. It also allows you to commit to purchases of electricity from renewable sources. Regardless of which kind of commitment you make, you will need to report your energy use broken down by source and fuel type.

**IMPORTANT: Do not include transportation-related fuel use in this table. Commitments to reduce transportation energy use should be reported separately under the indicator heading "Transportation Energy Use." Environmental management activities aimed at reducing air emissions resulting from combustion (VOCs, NOx, CO, and PM10) are better reported under the appropriate indicator in the Air Emissions category.**

[Type of Energy Commitment](#)  
[Energy Generated Off-Site](#)  
[Energy Generated On-Site](#)  
[Automatic Calculations](#)

### **Type of Energy Commitment**

You should describe your total energy use reduction in greater detail in the box above question 4a.

### **Energy Generated Off-Site**

Complete the first part of the table, "Energy Generated Off-Site" by filling in quantities for energy that you purchase as electricity or steam. You must use the units provided in the pull-down menu in the right column. Fill in the amount of energy you purchased during the "Baseline" calendar year in the left column. Fill in the amount you are committing to purchase during the "Future" calendar year in the center column.

Do not include any electricity or steam that you generate; the fuel used to generate this energy can be reported in the second part of the table.

### Energy Generated On-Site

Complete the second part of the table, "Sources of Energy Generated On-Site" by filling in the amounts of each fuel or energy source you used in the Baseline year and the amounts you are committing to use in your Future year. You must use the units provided in the right column for each source.

This section of the table is designed to allow you to report on all of the *fuel* that you use at your facility. Thus, if you generate electricity or steam on-site, you should report the quantity of fuels that you use, but not the quantity of electricity or steam generated. If you purchase natural gas to produce electricity on-site, you should report the quantity of natural gas your facility uses but not the quantity of electricity that you generate. Similarly, if you co-generate electricity and steam from natural gas, you should report the quantity of natural gas your facility uses but not the quantities of electricity and steam that you generate.

### Purchases of Electricity from Renewable Off-Site Sources

If you are committing to purchase electricity produced off-site from renewable sources, you will need to calculate the metric tons of carbon dioxide equivalent (MTCO<sub>2</sub>E) that will be offset by this purchase. The MTCO<sub>2</sub>E offset tons per KWh will vary among electricity providers. Please contact your electricity provider for this information or the Performance Track Information Center at 1-888-339-PTRK or [ptrack@indecon.com](mailto:ptrack@indecon.com) for help with this calculation.

### Automatic Calculations

By saving your work or hitting the Update button, the table will automatically calculate Total Energy Generated Off-Site, Total Energy Generated On-Site, and Total Energy Use by summing the quantities of energy and fuel you report in the table. The form will also aggregate Total Renewable Energy Use and Total Non-Renewable Energy Use by summing the appropriate entries in the table. For example, hydropower and solar power are characterized as renewable energy sources, while coal and natural gas are considered non-renewable.

Using MTCO<sub>2</sub>E conversion factors, the form will calculate the MTCO<sub>2</sub>Es generated from your use of each fuel source. A state-specific average, based upon your facility's location, is used to calculate the MTCO<sub>2</sub>Es generated as a result of your facility's use of electricity generated off-site. For example, facilities in states that use a higher proportion of fuels such as natural gas and hydropower for electricity production will have fewer MTCO<sub>2</sub>Es from off-site electricity than facilities in states that use more greenhouse gas intensive fuels (coal, oil) to produce electricity. The form then aggregates the MTCO<sub>2</sub>Es and Net MTCO<sub>2</sub>Es. For more detail on the specific calculations and conversion



factors, contact the Performance Track Information Center at 1-888-339-PTRK or [ptrack@indecon.com](mailto:ptrack@indecon.com).

## **Greenhouse Gas Emissions Commitments**

Your commitment to reduce greenhouse gas emissions may include reducing energy use, reducing process-related emissions, increasing offsets, or a combination of these. Whatever your activities, you must fill in Baseline and Future amounts for all sources that are present at your facility. These sources are broken down into direct emissions, indirect emissions, and offsets.

If your greenhouse gas emission reduction activities will consist solely of reducing energy use, it may be easier for you to make a commitment in the energy use indicator rather than in the greenhouse gas emissions indicator. You may not make a commitment in both areas. The units used for all greenhouse gas emissions sources are MTCO<sub>2</sub>Es.

For detailed guidance in filling out the greenhouse gas commitment form and/or calculating MTCO<sub>2</sub>E, see the Climate Leaders Greenhouse Gas Inventory Guidance Modules at <http://www.epa.gov/climateleaders/>.

[Type of GHG Commitment](#)

[Direct Emissions](#)

[Indirect Emissions](#)

[Offsets](#)

## **Type of GHG Commitment**

You may describe your greenhouse gas emission reduction in greater detail in the box above question 4a.

### **Direct Emissions**

Direct emissions are emissions from your facility's operations that go directly into the air. Under "Direct Emissions," fill in the measured quantities of emissions during the baseline year for each source type. Enter these emission quantities in the left column next to the source of the emission. These quantities must be in units of MTCO<sub>2</sub>Es.

Fill in the annual quantities of emissions for each source that you are committing to achieve by the future year. Enter these emission quantities in the center column in the row corresponding to the source of the emission. These quantities must be in units of MTCO<sub>2</sub>Es.

By saving your work or clicking the Update button, the form will automatically calculate your Total Direct Emissions.

### **Indirect Emissions**

Indirect emissions occur away from your facility, but are caused by your facility's operations, for example, emissions that occur at an electrical generating plant as a result of your electricity purchases. Under "Indirect Emissions," fill in the measured quantities of emissions during the baseline year for each source type. Enter these emission quantities in the left column next to the source of the emission. If you have indirect sources of emissions that are not listed, type these sources into the "Other" fields below the listed sources. Enter emission quantities for these sources for the baseline year in the "Baseline" column. All quantities must be in units of MTCO<sub>2</sub>Es.

Fill in the annual quantities that you are committing to achieve by the future year. Enter these quantities in the center column in the row corresponding to the source of the emission. These quantities must be in units of MTCO<sub>2</sub>Es.

By saving your work or clicking the Update button, the form will automatically calculate your Total Indirect Emissions.

### **Offsets**

Offsets are activities that may occur anywhere and result in a reduction of greenhouse gases in the atmosphere. Under Offsets, specify each source of offsets in the left column, and fill in the quantities measured during the baseline year and the quantity you are committing to achieve in the future year. These quantities must be in units of MTCO<sub>2</sub>E.

By saving your work or clicking the Update button, the form will automatically calculate your Total Reduction from Offsets, and your Total Emissions Less Offsets.

### **Non-hazardous Waste Commitments**

Non-hazardous waste includes any non-hazardous output (solid, semi-solid, or liquid) shipped off-site for treatment or disposal, excluding products and product packaging. Do not include in this indicator wastewater containing non-hazardous waste, non-hazardous waste resulting from product take-back initiatives, or non-hazardous waste resulting from community recycling programs.

Your non-hazardous waste commitment may be to reduce non-hazardous waste generation, to switch to an environmentally preferable management method, or both. If your commitment is to switch to an environmentally preferable management method, the total quantity of the non-hazardous waste must either remain the same or decrease in the future year. Activities that result in an increase in the line labeled "Total Non-hazardous waste" will not be accepted as a commitment.

Regardless of your activities, the quantities that you enter in this table must account for facility-wide waste of the type you entered in question 1c for this commitment.

Note: EPA's waste management hierarchy does not consider combustion to be environmentally preferable to landfilling.

[Type of Waste Commitment](#)  
[Baseline and Future Quantities](#)  
[Automatic Calculations](#)

### **Type of Waste Commitment**

You may describe your non-hazardous waste commitment in greater detail in the box above question 4a.

### **Baseline and Future Quantities**

For the first line of the table, in the left column choose one of the management methods that you use for this indicator from the pull-down menu. Move to the next cell to the right, and enter the quantity of the indicator that you managed with this method in the baseline year. Move another cell to the right, and enter the quantity of the indicator that you are committing to manage with this method in the future year. Choose the units you use for these quantities from the pull-down menu in the far right column. You must use one of the units from the pull-down menu.

Move to the second line, left column of the table, and choose another management method that you use for this indicator, and repeat the same process as above. Continue choosing management methods until you have listed all the methods you have used or will use for this indicator.

### **Automatic Calculations**

By saving your working or clicking the Update button, the form will automatically calculate the total non-hazardous waste for this indicator across all management methods. This total for the future year must be the same as or lower than the total for the baseline year.

### **Hazardous Waste Commitments**

Hazardous waste includes any hazardous nonproduct output (solid, semi-solid, or liquid) that the facility generates and treats on-site or ships off-site for treatment or disposal, excluding any waste generated as a service to the community. Do not include wastewater containing hazardous waste, hazardous waste resulting from product take-back initiatives, or hazardous waste resulting from community recycling programs.

Your hazardous waste commitment may be to reduce hazardous waste generation, to switch to an environmentally preferable management method, or both. If your commitment is to switch to an environmentally preferable management method, the total quantity of the hazardous waste must either

remain the same or decrease in the future year. Activities that result in an increase in the line labeled "Total Hazardous Waste" will not be accepted as a commitment.

Regardless of your activities, the quantities that you enter in this table must account for facility-wide waste of the type you entered in question 1c for this commitment.

Note: EPA's waste management hierarchy does not consider combustion to be environmentally preferable to landfilling.

[Type of Waste Commitment](#)  
[Baseline and Future Quantities](#)  
[Automatic Calculations](#)

### **Type of Waste Commitment**

You may describe your hazardous waste commitment in greater detail in the box above question 4a.

### **Baseline and Future Quantities**

For the first line of the table, in the left column choose one of the management methods that you use for this indicator from the pull-down menu. Move to the next cell to the right, and enter the quantity of the indicator that you managed with this method in the baseline year. Move another cell to the right, and enter the quantity of the indicator that you are committing to manage with this method in the future year. Choose the units you use for these quantities from the pull-down menu in the far right column. You must use one of the units from the pull-down menu.

Move to the second line, left column of the table, and choose another management method that you use for this indicator, and repeat the same process as above. Continue choosing management methods until you have listed all the methods you have used or will use for this indicator.

### **Automatic Calculations**

By saving your working or clicking the Update button, the form will automatically calculate the total hazardous waste for this indicator across all management methods. This total for the future year must be the same as or lower than the total for the baseline year.

## Section D Instructions

In this section, tell us about your commitment to public outreach.

Use the following links to view the instructions for each item in Section D. Required fields are noted using an asterisk (\*). If you need further assistance, contact the Performance Track Information Center at 1-888-339-PTRK or [ptrack@indecon.com](mailto:ptrack@indecon.com).

- [\\*1. How do you identify and respond to community concerns?](#)
- [\\*2. How do you inform community members of important matters that affect them?](#)
- [\\*3. How will you make the Performance Track Annual Performance Report available to the public?](#)
- [\\*4. Are there any ongoing citizen suits related to environmental issues against your facility?](#)
- [\\*5. List references below.](#)

**\*1. How do you identify and respond to community concerns?**

Briefly describe how you identify and respond to community concerns. (For example, "We hold an open house every six months to discuss issues with the community," or "We have an employee who takes calls from community members.")

**\*2. How do you inform community members of important matters that affect them?**

Briefly describe how you inform community members of important matters. (For example, "We send out a monthly newsletter detailing important issues.")

**\*3. How will you make the Performance Track Annual Performance Report available to the public?**

Tell us the way(s) that you will most likely distribute your Annual Performance Report by selecting one or more of the boxes. If you will be using a website, provide the URL. If "Other," please describe what will be done.

**\*4. Are there any ongoing citizen suits related to environmental issues against your facility?**

For the purposes of this question, we are referring to suits relating to environmental issues only. If there are any ongoing environmental citizen suits or

other legal actions, select “Yes” and briefly describe their current status. Otherwise, select “No.”

**\*5. List references below.**

We may call references to learn more about your facility. Enter the name of the person, the organization that the person represents, and telephone number. A person who is associated with your facility and who is also a member of a community/citizen group cannot be used as a reference. List at least one contact in each of the categories.

- **Representative of a community/citizen group.**

Name a person representing a community/citizen group based in your facility’s community. Examples include civic groups, neighborhood associations, local chapters of environmental groups, and community development organizations. Consider choosing a reference from a community/citizen group that is familiar with your facility either through proximity (e.g., a group representing an adjacent neighborhood) or other involvement with the facility (e.g., a group with representation on a facility’s community advisory committee).

- **State/ tribal/ local regulator.**

Name a person who is a regulator familiar with your facility. This person does not have to be associated with an environmental regulatory agency or department. For example, other appropriate regulatory agencies include those associated with public health or housing.

- **Other community/local reference (e.g., emergency management official or business associate).**

Name a person who is either an additional reference from one of the two categories above or a reference familiar with your facility and who represents another type of organization in the community. Potential references include a member of the Local Emergency Planning Committee (LEPC), a local labor union member, a representative from the local Chamber of Commerce, a university faculty member, or another business owner or operator.

## Section E

The primary purposes of this section are for the facility to certify that the information reported in the application is true, accurate, and complete, and that the facility continues to adhere to all the criteria for participation in the National Environmental Performance Track program.

The person who signs the form must a) be the senior manager with responsibility for the facility, b) be fully authorized to execute the statement on behalf of the corporation or other legal entity whose facility is part of the National Environmental Performance Track program, and c) have examined and be familiar with the information contained in the application. Once the rest of the application is completed, this person should read Section E in its entirety, ensure that each of the lines at the bottom of the page is completed (i.e. printed name, title, phone number, e-mail address, facility name, facility street address, alternative mailing address if appropriate, and Performance Track Identification Number), and sign and date the form in the space provided. All information, except for the alternate mailing address, is required.

If you need further assistance, please contact the Performance Track Information Center at 1-888-339-PTRK or [ptrack@indecon.com](mailto:ptrack@indecon.com).

## Environmental Requirements Checklist

Select all the requirements that apply to you. The Checklist is not intended to be an exhaustive list, but rather a reference to a number of major Federal, State, tribal, and local requirements that are applicable to a wide range of facilities. If you need further assistance, contact the Performance Track Information Center at 1-888-339-PTRK or [ptrack@indecon.com](mailto:ptrack@indecon.com).